

Annex A

Litigation Parties

	Litigation Party	Case Caption	Court	Docket Number	Opposing Party Contact	Nature of Monetary Claims	Letters Sent Pursuant to Procedures Order	Applicability of Plan Injunction Provisions	Status of Discussions
1	Alan B. Redmond and Marsha R. Redmond	Redmond, et al. v. GMAC Mortgage, LLC	Lexington County Circuit Court for the 11th Judicial Circuit	2011CP3204718	William B. Fortino, Esq. Moore, Taylor & Thomas, P.A. 1700 Sunset Boulevard West Columbia, SC 29171	Damages in connection with wrongful foreclosure, fraud, negligence	8/3/2017 2/2/2018	A settlement was reached between The Redmonds and the Borrower Claims Trust	The parties have not responded to the letters sent by the Liquidating Trust pursuant to the Procedures Order.
2	Josef Arnon	Arnon v. GMAC Mortgage, LLC	Seminole County Circuit Court for the 18th Judicial District	12-CA-1450-11-L	Earnest Deloach, Esq. Young Deloach, PLLC 1115 East Livingston Street Orlando, FL 32803	Damages in connection with negligence claims	8/3/2017 2/2/2018	The party did not file a timely proof of claim.	The party has not responded to the letters sent by the Liquidating Trust pursuant to the Procedures Order.
3	Booner and Shelli Beck	Beck, et al. v. GMAC Mortgage, et al.	Comal County Circuit Court for the 433rd Judicial District	C2011-0140D	Booner and Shelli Beck 324 Charon Point Spring Branch, TX 78707	Damages in connection with Wrongful Foreclosure, Fraud, Civil Conspiracy	8/3/2017 2/2/2018	The parties did not file a timely proof of claim.	The parties have not responded to the letters sent by the Liquidating Trust pursuant to the Procedures Order.
4	Joseph and Kathy Mills	Mills, et al. v. GMAC, LLC, et al.	Texas Court of Appeals for the First District	01-11-01104-CV	Robert C. "Chip" Lane The Lane Law Firm 6200 Savoy, Suite 1150 Houston, TX 77036-3300	Seeks damages and attorneys' fees	8/3/2017 2/2/2018	The parties did not file a timely proof of claim.	The parties have not responded to the letters sent by the Liquidating Trust pursuant to the Procedures Order.
5	Sing Min Lee	Lee v. GMAC Mortgage, LLC	Montgomery County District Court	060200026322013	Sing Min Lee 11701 Caplinger Road Silver Spring, MD 20904	Violation of Real Estate Settlement Procedures Act	8/3/2017 2/2/2018	The party did not file a timely proof of claim.	The party has not responded to the letters sent by the Liquidating Trust pursuant to the Procedures Order.
6	James Bailey	Residential Funding Company, LLC v. Bailey	Broward County Circuit Court for the 17th Judicial Circuit	CACE11015086	Joshua A. Bleil, Attorney at Law, P.A. 5855 La Gorce Circle Lake Worth, FL 33463	Asserts monetary claims in seeking to recover on a judgment	8/3/2017 2/2/2018	The party did not file a timely proof of claim.	The party has not responded to the letters sent by the Liquidating Trust pursuant to the Procedures Order.
7	William Vest and Teresa Vest	GMAC Mortgage, LLC v. Vest, et al.	Broward County Circuit Court for the 17th Judicial Circuit	CACE 08 008955-08	Joshua A. Bleil, Attorney at Law, P.A. 5855 La Gorce Circle Lake Worth, FL 33463	Asserts monetary claims in seeking to recover on a judgment	8/3/2017 2/2/2018	The party did not file a timely proof of claim.	The parties have not responded to the letters sent by the Liquidating Trust pursuant to the Procedures Order.

Annex B

Enforcement Order Notice

[CAPTION]

NOTICE OF BANKRUPTCY COURT ORDER

[Debtor Entity], by and through its undersigned counsel, respectfully submits this Notice of Bankruptcy Court Order, and states as follows:

1. On May 14, 2012 (the “**Petition Date**”), Residential Capital, LLC and certain of its direct and indirect subsidiaries, including [Debtor Entity] (collectively, the “**Debtors**”), filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”). The Debtors’ Chapter 11 cases (the “**Bankruptcy Cases**”) are being jointly administered, indexed at case number 12-12020 (MG).

2. On December 11, 2013, the Bankruptcy Court entered its Order Confirming Second Amended Joint Chapter 11 Plan Proposed by Residential Capital, LLC et al. and the Official Committee of Unsecured Creditors (the “**Confirmation Order**”) [Bankruptcy Docket 6065]¹ approving the terms of the Chapter 11 plan, as amended (the “**Plan**”). The effective date under the Plan occurred on December 17, 2013 (the “**Effective Date**”).

3. On [Date], the Bankruptcy Court entered the attached [*Order Granting ResCap Liquidating Trust’s Third Omnibus Motion to Enforce Injunctive Provisions of Plan and Confirmation Order*] which (i) bars [Litigation Party] from continuing to prosecute monetary claims against [Debtor Entity] under the injunction provisions of the Plan and Confirmation Order, and (ii) permits the Liquidating Trust to seek sanctions in the event [Litigation Party] continues in its refusal to dismiss monetary claims with respect to the Debtors.

Respectfully submitted this ____ day of _____, 2018.

¹ Due to its voluminous nature, the Confirmation Order, to which the Plan is an exhibit, is not included as an attachment, but a copy of the Confirmation Order and the Plan may be obtained at no charge at <http://www.kccllc.net/rescap>